

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER: 13
LISA ROSE MARIANI	:	CASE NO: 17-13760-MDC
	:	
DEBTOR	:	MOTION TO MODIFY PLAN
	:	as per 11 USC 1329(d)(1)(A)

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

The Debtor has filed a Motion to Modify Confirmed CH 13 Plan on May 20, 2020.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, then **on or before**

June 11, 2020, you or your attorney must do all of the following:

(a.) File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court, Eastern District of Pennsylvania
Robert N. C. Nix Sr. Federal Courthouse
900 Market Street
Philadelphia, PA 19107

(b.) Mail a copy to the Movant:

Paul A. R. Stewart, Esquire
Helm Legal Services LLC
333 E. Lancaster Avenue, Suite 140
Wynnewood, PA 19096

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Magdeline D. Coleman on Thursday, June 18, 2020 at 11:00 am at the Robert N.C. Nix Sr. Federal Courthouse, Courtroom #2, 900 Market Street, Philadelphia, PA 19107.

Dated: May 20, 2020

/s/ Paul A. R. Stewart
Paul A. R. Stewart, Esquire
Legal Helm LLC
333 E. Lancaster Ave, Suite 140
Wynnewood, PA 19096
610-864-5600
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Paul A. R. Stewart, Esquire, hereby certify that on May 20, 2020, I served via first class regular mail and/or electronic filing, with a true and correct copy of the Debtor's Notice of Motion, Response Deadline and Hearing Date upon:

Counsel for Bank

Kevin S. Frankel
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
610-278-6800

Rebecca Ann Solarz
KML Law Group
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-825-6327

United States Trustee

833 Chestnut Street, Suite 500
Philadelphia, PA 19107

William C. Miller, Esquire (Trustee)

1234 MARKET STREET, SUITE 1813
PHILADELPHIA, PA 19107

Dated: May 20, 2020

/s/ Paul A. R. Stewart

Paul A. R. Stewart, Esquire
Legal Helm LLC
333 E. Lancaster Ave, Suite 140
Wynnewood, PA 19096
610-864-5600
Attorney for Debtor